

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT P. SALAPUDDIN,
[DOB: 03/08/1982]

Defendant.

Case No. _____

COUNTS ONE and TWO:

Receipt of Child Pornography

Over the Internet

18 U.S.C. § 2252(a)(2)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

COUNT THREE:

Possession of Child Pornography

18 U.S.C. §§ 2252(a)(4) and (b)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

Criminal Forfeiture Allegation

18 U.S.C. § 2253(a)

(Forfeiture)

\$100 Mandatory Special Assessment

Each Count

SECRET INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about January 3, 2016, the date being approximate, in the Western District of Missouri and elsewhere, ROBERT P. SALAPUDDIN, defendant herein, using any means or facility of interstate or foreign commerce, knowingly received a visual depiction, separate and apart from the visual depictions relied upon in Counts Two and Three, that had been shipped and transported in, or affecting interstate and foreign commerce by any means including by computer,

and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and attempted to do so, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWO

On or about January 5, 2016, the date being approximate, in the Western District of Missouri and elsewhere, ROBERT P. SALAPUDDIN, defendant herein, using any means or facility of interstate or foreign commerce, knowingly received a visual depiction, separate and apart from the visual depictions relied upon in Counts One and Three, that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and attempted to do so, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT THREE

On or about January 11, 2017, in the Western District of Missouri, ROBERT P. SALAPUDDIN, knowingly possessed one or more films, videotapes and other matter which contained one or more visual depictions, separate and apart from the visual depictions relied upon in Counts One and Two, which involved a minor, that had been shipped and transported in or affecting interstate commerce, by any means including by computer, and which were produced

using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(4).

FORFEITURE ALLEGATION

The allegations contained in Counts One, Two, and Three are realleged and are incorporated by reference herein for the purpose of alleging forfeiture of: any visual depiction described in Title 18, United States Code, Section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses; including, but not limited to the following:

1. HARCF099569-Dell Dimension 8300 desktop computer, Service Tag #96K0Q31;
2. HARCF099699-Seagate, ST380011A 80 GB hard drive, s/n 3JV5M8JY from the Dell desktop above;
3. HARCF099700-Western Digital 160 GB hard drive, s/n WCAV37124246 from the Dell desktop above;
4. HARCF099567-HP Compaq Presario C500 laptop, s/n 2CA70113R9;
5. HARCF099701-Seagate ST98823A3 80 GB SATA hard drive, s/n 5PK3RHS9 from the HP Compaq laptop above;
6. iPhone 5, s/n DX392F0TFF9Y received from the defendant on or about January 11, 2017 at his residence; and

7. iPhone 6+, s/n FK1NPBPBG5QF received from the defendant on or about January 11, 2017 at his residence.

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL.

/s/ Shannon Cassidy

FOREPERSON OF THE GRAND JURY

/s/ David A. Barnes

David A. Barnes, Mo Bar #40031
Assistant United States Attorney
Special Victims Unit

Date: 6/26/19
Kansas City, Missouri